

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WILDSEED MOBILE LLC,	§	
	§	
Plaintiff,	§	Civil Action No. 6:22-CV-00357-ADA
	§	
v.	§	Jury Trial Demanded
	§	
GOOGLE LLC and YOUTUBE, LLC,	§	
	§	
Defendants.	§	
	§	

**DECLARATION OF CATHERINE C. PORTO IN SUPPORT OF OPPOSITION TO  
MOTION TO EXTEND VENUE DISCOVERY DEADLINE AND BRIEFING**

I, Catherine C. Porto, declare as follows:

1. I am an attorney licensed to practice in the state of California and before this Court. I am an associate with the law firm Keker, Van Nest & Peters LLP, counsel of record for Defendants Google LLC (“Google”) and YouTube, LLC (“YouTube”) (collectively “Defendants”) in this matter. Except where otherwise stated, I have personal knowledge of the facts stated in this declaration and, if called as witness, could and would testify competently to those facts.

2. I submit this declaration in support of Defendants’ Opposition to Motion to Extend Venue Discovery Deadline and Briefing.

3. Attached hereto as **Exhibit 1** is a true and correct copy of an email dated August 19, 2022, from Robert Xie to Judge Albright’s Law Clerk, attaching a “Discovery Dispute Chart.”

4. Attached hereto as **Exhibit 2** is a true and correct copy of an email from Robert Xie dated July 20, 2022.

5. Attached hereto as **Exhibit 3** is a true and correct copy of an email from Morgan Sharma dated July 22, 2022.

6. Attached hereto as **Exhibit 4** is a true and correct copy of a letter from Kristen Lovin dated July 29, 2022.

7. Attached hereto as **Exhibit 5** is a true and correct copy of an email from Robert Xie dated August 10, 2022.

8. Attached hereto as **Exhibit 6** is a true and correct copy of Plaintiff’s Second Set of Venue Interrogatories (No. 5) to Defendants Google LLC and YouTube, LLC, served on August 4, 2022.

9. Attached hereto as **Exhibit 7** is a true and correct copy of Defendants Google LLC and YouTube, LLC’s Objections to Plaintiff Wildseed Mobile LLC’s Second Set of Venue Interrogatories (No. 5), served August 16, 2022.

10. Attached hereto as **Exhibit 8** is a true and correct copy of an email from Jerry Tice Malhotra dated August 20, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 23, 2022, in San Francisco, California.

A handwritten signature in cursive script, reading "Catherine Porto", written in blue ink.

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CATHERINE C. PORTO